

JESSICA JULIAN

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF OKLAHOMA

3 WILLIAM RAY SPRAY, JR., and)
4 RHONDA JEAN SPRAY, Individually)
5 and as Personal Representatives)
6 of the ESTATE OF SINDI LUCILLE)
7 SPRAY, Deceased,)

8 Plaintiff(s),)

9 -vs-)

Case No. CIV-20-1252-C

10 BOARD OF COUNTY COMMISSIONERS)
11 OF OKLAHOMA COUNTY, in its)
12 Official Capacity as Governing)
13 Body of the County of Oklahoma)
14 County,)

15 Defendant(s).)

16 DEPOSITION OF JESSICA JULIAN, LPN

17 TAKEN ON BEHALF OF THE PLAINTIFF(S)

18 IN OKLAHOMA CITY, OKLAHOMA

19 ON SEPTEMBER 26, 2022

20
21
22 _____
23 REPORTED BY: LESLIE A. FOSTER, RPR
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1 assume that she was having just general -- she told me
2 she was having just general pain.

3 Q Below that, it's got the number 4 and it says
4 "Intermittent nausea"?

5 A Yes.

6 Q What does the 4 represent?

7 A It's a higher level. She's having more nausea
8 than what the -- like, the number one that was on the
9 previous page.

10 Q Does that go into the scoring system?

11 A Yes.

12 Q We've got that entry -- we should say for the
13 record we've gone from the 11:18 A.M. --

14 A Uh-huh.

15 Q -- to 7:55 P.M. where we talked about nausea
16 and vomiting a minute ago. So now we've crossed over to
17 an evening --

18 A Detox check.

19 Q -- shift?

20 A Yes.

21 Q So according to this, she's had intermittent
22 nausea and -- okay. We've covered that. On page 71,
23 about halfway from the bottom, you see an entry next to
24 where it says "Runny nose or tearing"; is that something
25 you observed where it says "nasal stuffiness or unusually

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1 are, but go to page 108.

2 A (Witness complying with request.)

3 Q Now, the reading on vitals here, there's one
4 that corresponds to December 14, 2018, at 7:55 P.M. Do
5 you see that?

6 A Yes.

7 Q Did you take these vitals?

8 A I did.

9 Q Blood pressure's high, is it not?

10 A Yes.

11 Q The pulse is real, real high, isn't it?

12 A Yes.

13 Q The entry where it says "Notes," are those
14 things that she told you, or are these things that you
15 observed, or is it both?

16 A Both.

17 Q Please tell me the part that she told you.

18 A Nausea, vomiting, restless legs, body pain, and
19 probably chills and sweats.

20 Q Did you observe the sweats, or did she just
21 tell you or can you tell from this?

22 A She probably would have told me that she was
23 having, like, night sweats or something, and so that's
24 what prompted that.

25 Q And you called Holly Martin. Is that correct?